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*Attorney in pro se and as Counsel for  
the Plaintiffs upon approval of Pro  
Hac Vice admission*

EVELYN ADAMS, Plaintiff

c/o **PHILIP J. BERG, ESQUIRE**

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LISA OSTELLA, and GO EXCEL GLOBA, Plaintiffs

c/o **PHILIP J. BERG, ESQUIRE**

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LISA LIBERI, Plaintiff

c/o **PHILIP J. BERG, ESQUIRE**

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**U.S. DISTRICT COURT, NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

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LISA LIBERI, et al,

Plaintiffs,

vs.

LINDA SUE BELCHER, et al,

Defendants.

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CIVIL ACTION

Case No. 2:11-cv-00090-J

Honorable Mary Lou Robinson

**DECLARATION OF KELLY STREBEL**

I, Kelly Strebel am over the age of eighteen and am not a party to the within action. I have personal knowledge of the facts herein and if called to do so I could and would completely testify. I am making this declaration under the penalty of perjury of the Laws of the United States pursuant to 28 U.S.C. § 1746.

1. I have witnessed the actions of the Defendants that gave rise to the filing of this lawsuit in Pennsylvania. This case was severed in to 2 parts, and transferred to California and Texas.

2. I am in close contact with Plaintiff Lisa Liberi and have been for over three years. I have seen the subpoena Defendant Ed Hale used in attempts to obtain the phone records of Lisa Liberi. This is concerning to me and my family.

3. My phone numbers, including but not limited to my home, cell and facsimile numbers have called and continue to call Plaintiff Liberi's phone numbers on a daily basis. None of the Defendants have any legal or permissible purpose to obtain my phone numbers from Plaintiff Lisa Liberi's phone records. My numbers in my home are not published numbers and I have expectation of keeping them private and confidential.

4. Because of this reason I am asking that Your Honor deny Ed Hales request to be able to Subpoena Lisa Liberi's phone records, or any other private

information of Lisa Liberi, as my phone numbers have called and received calls from Plaintiff Lisa Liberi.

5. Defendant Linda Belcher had my phone numbers before suit was filed, and once suit was filed I was forced to change my phone number due to continued harassment.

6. I have witnessed the Defendants publishing the Plaintiffs private data, especially that of Plaintiff Lisa Liberi. I listened to the May 28, 2009 radio show where Ed Hale and Neil Sankey discussed a loan Lisa Liberi had just taken out for her son's college. These defendants also stated and discussed their obtaining of Lisa Liberi's social security number, driver license number, date of birth and other private data. Defendant Ed Hale also removed Lisa Liberi's signature off of Court filed documents and posted it all over the Internet.

7. I have witnessed Defendant Ed Hale's continued false statements about the Plaintiffs; Ed Hale's vile name calling of the Plaintiffs; Ed Hale's encouragement of his radio listeners to harass the Plaintiffs and many other illegal acts.

8. I have also witnessed the Defendants in the California portion of this case publicize all the confidential information of the Plaintiffs; go on Defendant Ed Hale's radio program and make false statements about the Plaintiffs; harass the

Plaintiffs; encourage others to harass the Plaintiffs; incite violence against the Plaintiffs; they stalked Plaintiff Liberi's son; and again, other illegal acts.

9. Ed Hale had a radio show on or about June 25, 2009 where he and Linda Belcher threatened the Plaintiffs and all witnesses of the Plaintiffs. I listened to these Defendants making fun of Plaintiff Lisa Liberi and her heart complications and wishing her to have a heart attack.

10. For these reasons, I do not want any of the Defendants to have my address and/or telephone information. I do not want Ed Hale having my full signature either, as I fear he will remove it and place it on documents without knowledge and/or authorization.

11. Ed Hale only wants Plaintiff Lisa Liberi's phone records to further invade her privacy and to obtain the numbers to all of Lisa Liberi's friends, family, business associates, medical providers and other people in the lives of Lisa Liberi.

I declare under the penalty of perjury of the Laws of the United States and Texas that the foregoing is true and correct.

Executed this 1<sup>st</sup> day of September, 2011.

I have authorized Mr. Berg to sign my name electronically, which I have initialed so he is able to file my Declaration electronically and

not provide the Defendants with my full signature for the reasons outlined herein.

/s/ Kelly Strebel   
Kelly Strebel, Declarant